



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 10, 2008

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Keith A. Davis, Treasurer
National Republican Congressional Committee
320 First Street
Washington, DC 20003

Response Due Date:
May 12, 2008

Identification Number: C00075820

Reference: March Monthly Report (2/1/08 – 2/29/08)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 10 items:

1. The beginning cash balance of this report should equal the ending balance of your February Monthly Report (1/1/08 – 1/31/08). Please clarify this discrepancy and amend any subsequent report(s) that may be affected by this correction.
2. Schedule F of your report discloses the Aggregate General Election Expenditures for James Oberweis to be \$24,350. However, FEC calculations disclose this amount (s) to be \$14,560. Please amend your report to clarify this discrepancy.
3. Schedule B supporting Line 23 of your report discloses \$5,194 in activity identified as MEMO entries that do not appear to correspond with any itemized transaction(s). Please be advised, a memo entry is used to disclose additional information about an itemized transaction and the amount of a memo entry is not included in the total receipts or disbursements for the report. Please amend your report to provide clarifying information regarding this activity.
4. Your report discloses a payment(s) on Schedule B to "Wachovia, N.A." that has not been recorded on Schedule C. Loan payments must also be

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reflected on Schedule C. Please amend your report to clarify this discrepancy. 2 U.S.C. §434(b)(4)

5. Commission Regulations require that a committee disclose the identification of all individuals who contribute in excess of \$200 in a calendar year. (11 CFR §104.3(a)(4)(i)) Identification for an individual is defined as the **full name**, mailing address, **occupation** and **name of employer**. (11 CFR §100.12) Your report discloses contributions from individuals for which the identification is not complete.

You must provide the missing information, or if you are unable to do so, you must demonstrate that "best efforts" have been used to obtain the information. To establish "best efforts," you must provide the Commission with a detailed description of your procedures for requesting the information. Establishing "best efforts" is a three-fold process.

First, your original solicitation must include a clear and conspicuous request for the contributor information and must inform the contributor of the requirements of federal law for the reporting of such information. (11 CFR §104.7(b)(1))

Second, if the information is not provided, you must make one follow-up, stand alone effort to obtain this information, regardless of whether the contribution(s) was solicited or not. This effort must occur no later than 30 days after receipt of the contribution and may be in the form of a written request or an oral request documented in writing. (11 CFR § 104.7(b)(2)) The request must:

- clearly ask for the missing information, without soliciting a contribution;
- inform the contributor of the requirements of federal law for the reporting of such information, and
- if the request is written, include a pre-addressed post card or return envelope.

Third, if you receive contributor information after the contribution(s) has been reported, you shall either a) file with your next regularly scheduled report, an amended memo Schedule A listing all the contributions for which additional information was received; or b) file on or before your next regularly scheduled reporting date, amendments to the report(s) originally disclosing the contribution(s). (11 CFR §104.7(b)(4))

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Please provide the missing information or a detailed description of your procedures for requesting the information. For more information on demonstrating "best efforts," please refer to the Campaign Guide.

6. The identification of each contributor, including an adequate occupation and name of employer for each, must be provided if the person has contributed in excess of \$200 in the aggregate during the calendar year. Please amend Schedule A supporting Line 11(a)(i) for each entry inadequately identified as "Board Chairman"/ "Self," "Business"/ "R.p.g., Inc.," "Business Man"/ "Self," "Business Owner" "/ "Self," "Business Woman"/ "Self," "CEO"/ "Ceo," "Consultant"/ "Self," "Director"/ "Self Employed," "Environmental Engineer"/ "ASC," "Executive"/ "Self," "Laborer"/ "Bob Barker," "Marn"/ "Unv," "Member"/ "Arrow Direct Mktg. LLC," "Member"/ "Blueline Geo LLC," "Member"/ "Ernie Colegrove Cnstr. LLC," "Member"/ "Firm Foundation Buliders LLC," "Member"/ "Hygeia Holdings LLC," "Member"/ "Industrial Air LLC," "Member"/ "Maijeh Enterprise LLC," "Member"/ "Nano Business Alliance," "Member"/ "Re Lloyd Commod," "Member"/ "Trish and Sons LLC," "Mgt"/ "Self," "N / A"/ "N / A," "None"/ "None," "Operator"/ "Self," "Owner"/ "None," "Owner"/ "Self," "Pacs"/ "All American Amus," "President"/ "L P I," "President"/ "Self," "Professional"/ "Self," "Resused"/ "Resused," "Sales"/ "Rma," "Self"/ "Self," "Self"/ "Self Employed," "Self - Employed"/ "Self," "Self - Employed"/ "Self - Employed," "Self Employed"/ "Aaron Pest Control Inc," "Self Employed"/ "Analytical Services Inc.," "Self Employed"/ "San Joaquin Valley Neuro Surgery," "Self Employed"/ "Self," "Self Employed"/ "William A. Heck," "Sound Security Inc"/ "Self" and "Vice Chair"/ "Ccf."

7. Please amend Schedule B supporting Line 23 by providing the candidate's full name, state in which office is sought and congressional district for each contribution made. 11 CFR §104.3(b)(3)(ii) and (v)

8. Itemized disbursements must include a brief statement or description of why the disbursements were made. Please amend Schedule B supporting Line(s) 21(b) of your report to clarify the following description(s): "Generic Salaries" paid to Wachovia, NA and Transamerica East. For further guidance regarding acceptable purposes of disbursements, please refer to 11 CFR §104.3(b)(3).

9. Schedule B supporting Line 21(b) of your report discloses payments made to credit card companies. Payments made to credit card companies must identify in memo entries, the original vendors from which you have purchased an item or service if your payments to these vendors have

exceeded \$200 this year. Please amend your report by providing the name and mailing address of the original vendor, along with the date, amount and purpose of each payment as required by 11 CFR §104.9(b) and clearly identify on the Schedule B, which credit card payment each memo entry relates to.

10. Schedule B of your report discloses a reimbursement(s) to an individual(s) for apparent travel and subsistence advances in which the total amount reimbursed exceeds \$500. When the reimbursement amount to staff for travel and subsistence advances exceeds \$500, the payments by committee staff that make up the reimbursement may have to be itemized. For example, if the related payment(s) to any one vendor by the staff aggregates in excess of \$200 for the calendar year, the payment(s) must be itemized as a memo entry for that reimbursement. Each memo entry must include the complete name and address of the original vendor, as well as the date, amount and an adequate purpose. Please amend your report to include the missing information and clearly identify on the Schedule B, which reimbursement each memo entry relates to. If itemization is not necessary for a particular reimbursement to staff in excess of \$500, you must clarify this in an amendment to this report. 11 CFR §104.9 and Advisory Opinion 1996-20, footnote 3

-Your report disclosed a category of financial activity that has been reflected on the wrong line of the Detailed Summary Page. Corresponding entries for in-kind contributions that disclose the original vendor should be properly disclosed on a separate Schedule B, supporting Line 21(b) of the Detailed Summary Page. Please refer to the instructions for each line when determining the proper categorization(s) for your next filing.

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please

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NATIONAL REPUBLICAN CONGRESSIONAL COMMITTEE

Page 5

contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1157.

Sincerely,

A handwritten signature in black ink, appearing to read "Laura E. Sinram". The signature is fluid and cursive, with a large initial "L" and a stylized "S".

Laura E. Sinram
Senior Campaign Finance Analyst
Reports Analysis Division

221

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